

# EXHIBIT 15

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UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

Civil Action No. 04-11948-RGS

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SEYED MOHSEN HOSSEINE-SEDEHY, )  
Plaintiff )  
 )  
vs. )  
 )  
ERIN T. WITHINGTON and )  
THE CITY OF BOSTON, )  
Defendants )  
\*\*\*\*\*

DEPOSITION OF MOHSEN HOSSEINI, a  
witness called on behalf of the Defendants,  
pursuant to the Massachusetts Rules of Civil  
Procedure, before Kelly G. Patterson, a  
Notary Public in and for the Commonwealth of  
Massachusetts, at the Law Department of City  
Hall, Room 615, Boston, Massachusetts, on  
Friday, October 14, 2005, commencing at  
9:23 a.m.

1 pulled me out. We went in an elevator and I  
2 ended up in another cell.  
3 Q. Do you know what cell this was, what  
4 station?  
5 A. This was the court or whatever it was,  
6 because I ended up in front of a judge  
7 eventually.  
8 Q. So this was all in the same day, March 22,  
9 2004?  
10 A. Yes, ma'am.  
11 Q. Do you remember what court that was?  
12 A. No, ma'am. Maybe my attorney could help  
13 you, because I don't know the court system.  
14 All I know is they took me, they took my  
15 things again, they put me in the cell with  
16 two guys who were there for God knows what,  
17 and then later on my attorney and I were  
18 talking and they were like "Oh, boy, I  
19 thought you were molesting a kid. You  
20 molested a guy?" Humiliation.  
21 Q. Where did this occur?  
22 A. This was in the court's jail.  
23 Q. In the first cell that you were transported  
24 to, was there anyone else that you spoke to?

1 A. No, the first cell was just them and all I  
2 had was me in the cell.  
3 Q. Did you speak to any other detectives in  
4 that first cell?  
5 A. One guard checked on the prisoners. I asked  
6 if it's going to be long. He said he didn't  
7 know.  
8 Q. Did you see Detective Schroeder at any point  
9 during this time?  
10 A. I did not see Detective Schroeder after I  
11 was put in paddy wagon in front of Hynes  
12 Convention Center. I never see her again.  
13 Q. You were transported to the second cell,  
14 that was at the courthouse?  
15 A. Yes, ma'am.  
16 Q. Were you in the same cell as two other  
17 individuals?  
18 A. Yes, ma'am, and there were a bunch of other  
19 folks out there. They were yelling at each  
20 other for cigarettes. They were trying to  
21 con the guards into giving them juices,  
22 cigarettes, just a bunch of guards and  
23 individuals. I won't call them criminals,  
24 because, God knows, maybe some of them were

1 as innocent as I was.  
2 Q. How long were you in the second cell at the  
3 courthouse?  
4 A. I don't remember. I want to say maybe an  
5 hour, but when Mr. Butler showed up and  
6 started calling my name, I was -- and then  
7 introduce himself, I just say "God, thank  
8 you," because after that point, and even  
9 after that, I had no clue what was going on  
10 to me.  
11 Q. Had you called anybody to when you had the  
12 opportunity to make a phone call?  
13 A. Who to call?  
14 Q. So that's a no?  
15 A. It was just me and my family in the city at  
16 the time.  
17 Q. Mr. Butler was your attorney during the next  
18 proceeding?  
19 A. GES, my company, had contacted Mr. Butler.  
20 Later on, I found out Mr. Casterline had  
21 contacted the superiors, who immediately  
22 contacted the attorney's office and Mr.  
23 Butler.  
24 Q. What happened after you were in the second

1 cell, did you then appear before the Court?  
2 A. We appeared before the Court. I wasn't told  
3 again what I was there for. I was told by  
4 the judge that I had been arrested on sexual  
5 harassment charges. I was told I'm not  
6 allowed to get close to my accuser. I still  
7 don't know my accuser, by the way. I still  
8 don't know my accuser at this time. I was  
9 given a piece of paper by my attorney that I  
10 had been released on my own self, that I  
11 have to keep that piece of paper on me  
12 wherever I go so cops don't arrest me, and  
13 just be in touch with my attorney. I  
14 thanked him, said goodbye to him, went  
15 downstairs. By that time, I turned my cell  
16 phone on. Casterline called me. He and  
17 Mr. John Perry, the president of the  
18 Teamster's Union, picked me up in John  
19 Perry's car.  
20 Q. From the courthouse?  
21 A. From the courthouse.  
22 Q. That was Mr. Casterline, Mr. Perry and --  
23 that's not Joe Perry?  
24 A. No, John Perry, the president of the local